

ORIGINAL

Approved: MADISON REDDICK SMYER
 MADISON REDDICK SMYER
 Assistant United States Attorney

Before: THE HONORABLE BARBARA MOSES
 United States Magistrate Judge
 Southern District of New York

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UNITED STATES OF AMERICA	:	<u>COMPLAINT</u>
- v. -	:	Violations of 18 U.S.C.
	:	§ 1951
COREY SAMERSON,	:	
a/k/a "Capo,"	:	COUNTY OF OFFENSE:
	:	NEW YORK
Defendant.	:	
-----X	:	

SOUTHERN DISTRICT OF NEW YORK, ss.:

ANGELO TESSITORE, being duly sworn, deposes and says that he is a Task Force Officer with the Bureau of Alcohol, Tobacco, Firearms, and Explosives/New York City Police Department Joint Robbery Task Force, and charges as follows:

COUNT ONE

(Hobbs Act Robbery)

1. On or about January 3, 2022, in the Southern District of New York and elsewhere, COREY SAMERSON, a/k/a "Capo," the defendant, knowingly did commit robbery, as that term is defined in Title 18, United States Code, Section 1951(b)(1), and did thereby obstruct, delay, and affect commerce and the movement of articles and commodities in commerce, as that term is defined in Title 18, United States Code, Section 1951(b)(3), to wit, SAMERSON, using what appeared to be a firearm, robbed an e-smoke convenience store ("Store-2") in the vicinity of Saint Marks Place and 2nd Avenue in New York, New York.

(Title 18, United States Code, Section 1951.)

COUNT TWO

(Hobbs Act Robbery)

2. On or about January 3, 2022, in the Southern District of New York and elsewhere, COREY SAMERSON, the defendant, knowingly did commit robbery, as that term is defined in Title 18, United States Code, Section 1951(b)(1), and did thereby obstruct, delay, and affect commerce and the movement of articles and commodities in commerce, as that term is defined in Title 18, United States Code, Section 1951(b)(3), to wit, SAMERSON, using what appeared to be a firearm, robbed a smoothie restaurant ("Restaurant-1") in the vicinity of 7th Avenue and West 38th Street in New York, New York.

(Title 18, United States Code, Section 1951.)

The bases for my knowledge and the foregoing charges are, in part, as follows:

3. I have been a Detective with the New York City Police Department ("NYPD") for more than 24 years, and I am currently a Task Force Officer with the Bureau of Alcohol, Tobacco Firearms and Explosives ("ATF")/NYPD Joint Robbery Task Force ("Task Force"). I have been personally involved in the investigation of this matter. This affidavit is based upon my conversations with other law enforcement officers; my examination of surveillance videos, photographs, law enforcement reports, and other law enforcement records; and my involvement in this investigation. Because this affidavit is being submitted for the limited purpose of establishing probable cause, it does not include all the facts that I have learned during the course of my investigation. Where the contents of documents and the actions, statements, and conversations of others are reported herein, they are reported in substance and in part, except where otherwise indicated.

The Robbery Pattern

4. The Task Force is investigating a pattern of armed robberies that took place in commercial establishments in Manhattan and Brooklyn, New York, between on or about January 3, 2022 and on or about January 7, 2022 (the "Robbery Pattern").

5. I and other law enforcement officers have identified at least six robberies as being part of the Robbery Pattern. In general, the Robbery Pattern consists of the following:

a. The robberies occur in the afternoon or early evening;

b. The robber enters the store when employee(s) are present;

c. The robber usually displays what appears to be a black firearm or a black firearm with a white handle;

d. The robber usually carries a crossbody bag or fanny pack and wears a silver pinky ring; and

e. The robber has discoloration on his hands that is consistent with tattoos.

6. As described below, this robber has been identified as COREY SAMERSON, a/k/a "Capo," the defendant.

Jewelry Store Incident

7. Based on my conversations with other law enforcement officers and my review of law enforcement reports, surveillance video, and photographs, I have learned the following about an incident on January 3, 2022 (the "Jewelry Store Incident"):

a. On or about January 3, 2022, at approximately 4:50 p.m., a black male individual entered a jewelry store ("Store-1") in the vicinity of 1st Avenue between East 13th Street and East 14th Street in New York, New York, in a busy commercial and residential area in the East Village.

b. Video surveillance shows that the individual was wearing a dark-colored Nautica jacket, a black hoodie, black sweatpants, a black ski mask, and distinctive black and white Nike sneakers with a white panel on the top of the right foot. The video surveillance also shows that the individual was wearing a black crossbody bag or fanny pack under his jacket. In addition, video surveillance shows that the individual had discoloration on his hands and a silver ring on his pinky finger. Still images of the individual, as captured by surveillance video, are copied below:



c. From video surveillance and law enforcement reports, I know that the individual entered Store-1 and approached the counter. He spoke with two employees of Store-1. One of the employees ("Victim-1") assisted the individual in looking at jewelry, and the individual touched the glass counter several times in pointing out pieces of jewelry. When other customers entered Store-1, the individual backed away from the counter and eventually left. After a short time, the individual re-entered Store-1. He again approached the counter. This time, he displayed what appeared to be a black firearm and told Victim-1 not to move. Victim-1 backed up, and the individual rushed out of Store-1.

d. From video surveillance and conversations with law enforcement, I know that after the individual left Store-1, surveillance video captured him taking off his dark-colored Nautica jacket, turning it inside out, and putting it back on.

8. From conversations with law enforcement officers and review of law enforcement reports, I know that law enforcement responded to Store-1 and collected evidence. Specifically, they found fingerprints on Store-1's glass counter that matched the prints of COREY SAMERSON, a/k/a "Capo," the defendant.

9. From my review of law enforcement reports, I know that COREY SAMERSON, a/k/a "Capo," the defendant, has tattoos on his hands. Surveillance video from the Jewelry Store Incident shows discoloration on the hands of the individual that is consistent with tattoos.

10. Given the fingerprint match to COREY SAMERSON, a/k/a "Capo," the defendant, and the discoloration on the individual's hands, I believe that the individual is SAMERSON.

Robbery-1

11. Based on my conversations with other law enforcement officers and my review of law enforcement reports, surveillance video, and photographs, I have learned the following about a robbery on January 3, 2022 ("Robbery-1"):

a. On or about January 3, 2022, at approximately 5:00 p.m., a black male individual entered an e-smoke convenience store ("Store-2") in the vicinity of Saint Marks Place and 2nd Avenue in New York, New York. According to Google Maps, Store-2 is located in the East Village, approximately six blocks from Store-1.

b. Video surveillance shows that the individual was wearing a dark-colored Nautica jacket, a black hoodie, black sweatpants, a black ski mask, and distinctive black and white Nike sneakers with a white panel on the top of the right foot. Video surveillance also shows that the individual was wearing a black crossbody bag or fanny pack under his jacket. In addition, video surveillance shows that the individual had discoloration on his hands and a silver ring on his pinky finger. Still images of the individual, as captured by surveillance video, are copied below:





c. From video surveillance and law enforcement reports, I know that the individual approached the counter of Store-2 and spoke with an employee ("Victim-2"). Another customer was at the counter. The individual left Store-2. Shortly thereafter, the individual re-entered Store-2 and again approached the counter. He displayed what appeared to be a black firearm and demanded money from the register. The individual stole approximately \$700 and fled.

12. Because of the similarity of clothing, appearance, and behavior of the individual to COREY SAMERSON, a/k/a "Capo," the defendant, in the Jewelry Store Incident, as well as the proximity in location and time to the Jewelry Store Incident, I believe the individual is SAMERSON.

Robbery-2

13. Based on my conversations with other law enforcement officers and my review of law enforcement reports, surveillance video, and photographs, I have learned the following about a second robbery on January 3, 2022 ("Robbery-2"):

a. On or about January 3, 2022, at approximately 6:15 p.m., a black male individual entered a smoothie restaurant ("Restaurant-1") in the vicinity of 7th Avenue and West 38th Street in New York, New York. According to Google Maps, Restaurant-1 is approximately five blocks from Times Square. Google Maps also indicates that it takes approximately 40 minutes to travel from

Store-2 to Restaurant-1 by foot and approximately 20 minutes by subway or car.

b. Video surveillance shows that the individual was wearing a dark-colored Nautica jacket, a black hoodie, black sweatpants, a black ski mask, and distinctive black and white Nike sneakers with a white panel on the top of the right foot. Video surveillance also shows that the individual was wearing a black crossbody bag or fanny pack under his jacket. In addition, video surveillance shows that the individual had discoloration on his hands and a silver ring on his pinky finger. Still images of the individual, as captured by surveillance video, are copied below:



c. From video surveillance and law enforcement reports, I know that the individual approached the counter of Restaurant-1 and ordered an item. While the Restaurant-1 employee ("Victim-3") was charging the individual for the item, the individual pulled what appeared to be a black firearm with a white handle out of his black crossbody bag or fanny pack and demanded money. Victim-3 removed approximately \$500 from the register and placed the money on the counter. The individual took the money and fled. Still images of this exchange, as captured by surveillance video, are copied below:



14. From conversations with law enforcement officers who reviewed the social media accounts of COREY SAMERSON, a/k/a "Capo," the defendant, and my review of his social media posts, I know that on or about January 7, 2022, SAMERSON posted a video in which he was wearing a black hoodie, black sweatpants, and a silver pinky ring, and had what appears to be a black firearm with a white handle tucked into his waist band. A still photograph from this video is copied below:



15. Because of the similarity of clothing, appearance, and behavior of the individual in Robbery-2 to COREY SAMERSON, a/k/a "Capo," the defendant, in the Jewelry Store Incident and Robbery-1, as well as the social media post in which SAMERSON displays what appears to be the same firearm that was used in Robbery-2, I believe the individual is SAMERSON.

Robbery-3

16. Based on my conversations with other law enforcement officers and my review of law enforcement reports, surveillance video, and photographs, I have learned the following about a robbery on January 4, 2022 ("Robbery-3"):

a. On or about January 4, 2022, at approximately 3:30 p.m., a black male individual entered a convenience store ("Store-3") in the vicinity of Bedford Avenue and North 5th Street in Brooklyn, New York, in a busy commercial and residential area of Williamsburg.

b. Video surveillance shows that the individual was wearing a black overcoat with buttons, a black hoodie, a black ski mask, and black pants, as well as a black crossbody bag or fanny pack under his coat. Video surveillance also shows that the individual had discoloration on his hands and a silver ring on his pinky finger.

c. From video surveillance and law enforcement reports, I know that the individual approached the counter of Store-3 and spoke with a Store-3 employee ("Victim-4"). The individual moved the black ski mask below his chin, pulled what appeared to be a black firearm with a white handle out of his black crossbody bag or fanny pack, and demanded money. Victim-4 opened the cash register and handed the individual \$500. The individual took the money and fled.

17. Because of the similarity of clothing, appearance, and behavior of the individual to COREY SAMERSON, a/k/a "Capo," the defendant, in the Jewelry Store Incident and Robberies -1 and -2, as well as the individual's use of what appeared to be a black firearm with a white handle, I believe the individual is SAMERSON.

Robbery-4

18. Based on my conversations with other law enforcement officers and my review of law enforcement reports, I have learned the following about an attempted robbery on January 4, 2022 ("Robbery-4"):

a. On or about January 4, 2022, at approximately 3:45 p.m., a black male individual entered a smoke shop ("Store-4") in the vicinity of Bedford Avenue and North 6th Street in Brooklyn, New York. According to Google Maps, Store-4 is located in Williamsburg, approximately one block away from Store-3.

b. From law enforcement reports, I know that the individual was wearing a black jacket, a black ski mask, and black pants, as well as a black fanny pack.

c. Based on law enforcement reports, I know that the individual entered Store-4 and walked toward the register. A Store-4 employee ("Victim-5") was present. The individual pulled what appeared to be a black firearm with a white handle out of the black fanny pack and demanded money. However, another employee entered Store-4, and the individual fled without taking any money.

19. Because of the similarity of clothing and behavior of the individual to COREY SAMERSON, a/k/a "Capo," the defendant, in the Jewelry Store Incident and Robberies -1 through -3, as well as the individual's use of what appeared to be a black firearm with a white handle and the proximity in location and time to Robbery-3, I believe the individual is SAMERSON.

Robbery-5

20. Based on my conversations with other law enforcement officers and my review of law enforcement reports, surveillance video, and photographs, I have learned the following about an additional robbery on January 4, 2022 ("Robbery-5"):

a. On or about January 4, 2022, at approximately 3:50 p.m., a black male individual entered a soft serve frozen yogurt and ice cream restaurant ("Restaurant-2") in the vicinity of North Seventh Street between Bedford Avenue and Berry Street in Brooklyn, New York. According to Google Maps, Restaurant-2 is located in Williamsburg, around the block from Store-4.

b. Video surveillance shows that the individual was wearing a black overcoat with buttons, a black hoodie, a black ski mask, and black pants, as well as a black crossbody bag or fanny pack under his coat. Video surveillance also shows that the individual had discoloration on his hands and a silver ring on his pinky finger.

c. From video surveillance and law enforcement reports, I know that the individual approached the counter of Restaurant-2 and spoke with a Restaurant-2 employee ("Victim-6"). From law enforcement reports of an interview with Victim-6, I know that the individual displayed what appeared to be a knife and demanded money. Victim-6 gave the individual money from the cash register. The individual then followed Victim-6 to a safe in a back room. Victim-6 opened the safe and gave the individual more money, and the individual fled.

21. Because of the similarity of clothing, appearance, and behavior of the individual to COREY SAMERSON, a/k/a "Capo," the defendant, in the Jewelry Store Incident and Robberies -1 through -4, as well the proximity in location and time to Robberies -3 and -4, I believe the individual is SAMERSON.

Robbery-6

22. Based on my conversations with other law enforcement officers and my review of law enforcement reports, I have learned the following about a robbery on January 7, 2022 ("Robbery-6"):

a. On or about January 7, 2022, at approximately 3:45 p.m., a black male individual entered a smoke shop ("Store-5") in the vicinity of Bedford Avenue in Brooklyn, New York.

According to Google Maps, Store-5 is located in Williamsburg near Store-3, Store-4, and Restaurant-2.

b. From law enforcement reports, I know that the individual was wearing a brown jacket and black pants and had tattoos on both hands.

c. Based on law enforcement reports, I know that the individual entered Store-5 when a Store-5 employee ("Victim-7") was present. The individual displayed what appeared to be a black firearm and demanded money. The individual stole approximately \$1200 and CBD products and fled.

23. From conversations with law enforcement officers who reviewed social media accounts of COREY SAMERSON, a/k/a "Capo," the defendant, I know that SAMERSON was featured in a social media post on or about January 6, 2022, wearing what appears to be the same brown jacket that was worn in Robbery-6.

24. From conversations with law enforcement officers who reviewed the social media accounts of COREY SAMERSON, a/k/a "Capo," the defendant, as well as my review of social media posts, I know that on or about January 7, 2022, SAMERSON posted a video on his social media account that shows a hand with tattoos sorting through what appear to be CBD products on a bed with a blue striped bedspread.

25. Because of the tattoos on the hands of the individual who committed Robbery-6, the proximity in location to Robberies -3 through -5, and the similarity of behavior of the individual to COREY SAMERSON, a/k/a "Capo," the defendant, in the Jewelry Store Incident and Robberies -1 through -5, as well as the social media posts in which SAMERSON is wearing what appears to be the same jacket worn in Robbery-6 and sorting through what appear to be CBD products, I believe the individual is SAMERSON.

26. Based on my training and experience, I know that commercial establishments such as Store-1, Store-2, Store-3, Store-4, Store-5, Restaurant-1, and Restaurant-2 obtain some of the goods they offer for sale through interstate or international commerce.

Other Developments

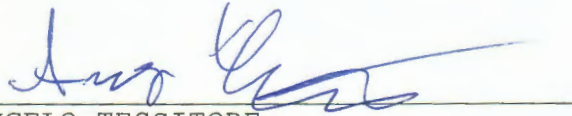
27. On or about January 7, 2022, the Honorable Roanne L. Mann of the Eastern District of New York issued a search warrant for a house ("House-1") in the vicinity of East 83rd Street in

Brooklyn, New York. Based on records with U.S. Probation,¹ as well as conversations law enforcement had with a family member of COREY SAMERSON, a/k/a "Capo," the defendant, I know that SAMERSON resides at House-1.

28. On or about January 7, 2022, law enforcement conducted a search of the bedroom of COREY SAMERSON, a/k/a "Capo," the defendant, and the common areas in House-1. From my personal involvement in the search, I know that law enforcement recovered the black overcoat with buttons that appears to have been worn in Robberies -3 and -5, the brown jacket that appears to have been worn in Robbery -6, and CBD products that appear to have been stolen during Robbery-6.

29. On or about January 9, 2022, law enforcement arrested COREY SAMERSON, a/k/a "Capo," the defendant, as he was leaving a hotel in the vicinity of 36th Street in Queens. From SAMERSON, law enforcement recovered, among other things, a black BB gun with a white handle, a silver pinky ring, and a black ski mask.


WHEREFORE, I respectfully request that COREY SAMERSON, a/k/a "Capo," the defendant, be imprisoned or bailed, as the case may be.



ANGELO TESSITORE
Task Force Officer
ATF/NYPD Joint Robbery Task Force

Sworn to before me this,

10th day of January, 2022



THE HONORABLE BARBARA MOSES
United States Magistrate Judge
Southern District of New York

¹ SAMERSON pled guilty to six counts of Hobbs Act robbery in or about January 2019, and he began federal supervised release in or about November 2021.